STIPULATION AND PROPOSED ORDER TO VACATE
CASE MANAGEMENT CONFERENCE
AND ASSOCIATED DEADLINES
CASE No. 3:11-cv-02456-JSW

STIPULATION TO VACATE CASE MANAGEMENT CONFERENCE AND ASSOCIATED DEADLINES

- 1. Defendants Sony Corporation of America (SCA), Sony Online Entertainment LLC (SOE), Sony Computer Entertainment America LLC (SCEA), Sony Network Entertainment International LLC (SNEI), and Sony Network Entertainment America Inc. (SNEA), as well as certain related entities (collectively, the "Sony Defendants"), have been named as defendants in at least sixty-two (62) putative class action lawsuits, including this lawsuit, to date;
- 2. A motion is currently pending before the Judicial Panel on Multidistrict Litigation (the "JPML") to centralize this and other matters before a single district court, to which multiple responses, including the Sony Defendants' response, have been filed to date and are under submission before the JPML, with a hearing date of July 28, 2011;
- 3. The current date of the initial Case Management Conference ("CMC") in this case is August 26, 2011 and certain other deadlines are set forth in the Order Setting Initial Case Management Conference and ADR Deadlines;
- 4. The parties agree that it is in the best interests of all parties to vacate the CMC and associated deadlines in this case in order to facilitate the scheduling of this matter in coordination with the schedule for the motion and hearing before the JPML;

NOW, THEREFORE, all parties, by and through their respective counsel, hereby stipulate for an order as follows:

In light of the motion for centralization pending before the JPML, the CMC and all associated deadlines, including those set forth in the Order Setting Initial Case Management Conference and ADR Deadlines, in the above-entitled action shall be vacated and further pretrial and scheduling matters shall be addressed by the transferee judge following centralization or, in

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1	the event such motion for centralization is denied, the defendants will notify the Court within 7	
2	days after such denial, so that the Court may at that time issue a revised case schedule.	
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4	Dated: July 27, 2011 ANDREW JOSEPH SOKOLOWSKI	
5	DAVID LISHIAN CHENG MIRIAM LEIGH SCHIMMEL INITIATIVE LEGAL GROUP APC	
6 7		
8	By: /s/ Andrew J. Sokolowski /s/ [as authorized]	
9	Andrew J. Sokolowski	
10	Attorneys for Plaintiff THOMAS FLAMSON	
11	JIN CHUNG	
12		
13	Dated: July 27, 2011 HARVEY WOLKOFF THAD A. DAVIS ROCKY C. TSAI	
14	ROCKT C. ISAT ROPES & GRAY LLP	
15		
16	By: /s/ Rocky C. Tsai /s/ Rocky C. Tsai	
17	Attorneys for Defendants	
18	SONY COMPUTER ENTERTAINMENT AMERICA LLC and	
19	SONY NETWORK ENTERTAINMENT INTERNATIONAL LLC	
20		
21		
22	[PROPOSED] ORDER	
23	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
24		
25	Dated: July 28, 2011 By: Jeffrey Swhits	
26	Dated: July 28, 2011 By: Spistrict Court Judge	
27		
28	_3_ STIPULATION AND Proposed Order to Vac.	AT]